

Michael Satterwhite  
The Satterwhite Law Firm, P.C.  
PO Box 569 REVERE MA 02151  
*Attorney for Tiago H Pereira*

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF MASSACHUSETTS**

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	)	
	)	
IN RE Edgar Vasquez De Miranda	)	Cause No: 16-10026
Neto	)	
	)	
	)	
Debtor.	)	
	)	
	)	

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TIAGO H PEREIRA,	)	
	)	
Plaintiff,	)	<b>ADVERSARY</b>
	)	<b>PROCEEDING</b>
v.	)	<b>(COMPLAINT</b>
	)	<b>OBJECTING TO</b>
	)	<b>DISCHARGE OF DEBTS)</b>
	)	
	)	No.16-01081

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EDGARD VASQUES DE MIRANDA NETO	)	
	)	
Defendant.	)	

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**PLAINTIFF’S RULE 26(a)(1) INITIAL DISCLOSURES**  
**I. INDIVIDUALS LIKELY TO HAVE DISCOVERABLE INFORMATION**  
**THAT MAY BE USED TO SUPPORT NOREX’S CLAIMS:**

Plaintiff's initial disclosure is made without the benefit of any discovery and prior to Defendant's answers. Plaintiff reserves the right to amend its disclosures to add additional witnesses.

*A. Individuals Associated With Plaintiff*

1. Alba DeSimone  
225 Sargent St  
Revere MA 02151

2. Paulo J Moura  
11 Russell St  
Cambridge, MA 02140

Information includes: full knowledge of dispute

*B. Individuals and Entities Affiliated with Defendants*

1. Joilton B. Azeredo  
39 Pebble Pl  
Malden, MA 02148

2. Lorena Vasques aka Lorena Delime  
104 Green Street  
Reading MA 01867

3. Adriano Costa  
14 Jones St ,  
Everett MA 2149

Information includes: full knowledge of dispute

4. Shamrock Finance LLC

Information includes: defendant asset information on the vehicles at the used car dealership

**II. CATEGORIES AND LOCATION OF DOCUMENTS:**

1. Documents related to sale of Stadium Auto Sales.

2. Documents related to use of funds paid for by Plaintiff for the Stadium Auto Sales.
3. Documents related to Defendant's ownership in Stadium Auto Sales.
4. Documents related to amounts paid to Defendant for Stadium Auto Sales.
5. Documents related to the Defendant's commercial lease at 35-A Everett Ave, Everett MA 02149.
6. Documents related to takeover of the vehicles at 35-A Everett Ave, Everett MA 02149 by Shamerock and/or its affiliates, including, but not limited to, corporate documents, court pleadings and decisions, correspondence and facsimiles.
7. Documents relating to the existence and operations of various used cars companies, including, but not limited to, corporate documents, invoices, correspondence, facsimiles and e-mails.
10. Documents relating to the money laundering and tax evasion activities of the defendant (including existence and operation of various used companies), including, but not limited to, corporate documents, invoices, correspondence, and various e-mails.
11. Documents related to the actions brought by other Plaintiffs involving used cars in before and after commencement of this action against Defendant including court pleadings and decisions.

### **III. COMPUTATION OF DAMAGES**

Plaintiff has suffered damages, as follows:

- (1) The amount paid for the dealership, the 93A claims, the amount Plaintiff lost in the fraudulent transaction, the amount Plaintiff lost due to the breach of contract by Defendant.

Total damages: \$47,435.00, plus interest, cost and fees.

### **IV. INSURANCE**

Plaintiff, at this time, is not aware of any insurance agreement under which any persons carrying on an insurance business may be liable to satisfy all or part of a judgment which may be entered in favor of Plaintiff or to indemnify or reimburse Defendant for payments to satisfy the judgment.

DATED this 26th day of August, 2016

By: /s/ Michael A. Satterwhite

Michael A. Satterwhite

The Satterwhite Law Firm, P.C.

*Attorney for Tiago H Pereira*

### **CERTIFICATE OF SERVICE**

Under penalty of perjury, the undersigned hereby certifies that on August 26, 2016, I served a true and exact copy of the foregoing document by depositing the same in the U.S. Mail, first class postage prepaid, or via CM/ECF addressed to the following:

George J. Nader  
210 Broadway #101,  
Lynnfield, MA 01940

DATED this 26TH day of August, 2016

By: /s/ Michael A. Satterwhite  
Michael A. Satterwhite  
The Satterwhite Law Firm, P.C.  
*Attorney for Tiago H Pereira*